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Proposed Lead Counsel for Proposed Lead Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

RETAIL WHOLESALE
DEPARTMENT STORE UNION
LOCAL 338 RETIREMENT FUND, on
Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

vs.

BEYOND MEAT, INC., et al.,

Defendants.

Case No. 2:23-cv-03602-MWF-AGR

CLASS ACTION

NOTICE OF MOTION AND MOTION
FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF
SELECTION OF LEAD COUNSEL

DATE: August 7, 2023

TIME: 10:00 a.m.

CTRM: 5A

JUDGE: Hon. Michael W. Fitzgerald

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that on Monday, August 7, 2023, at 10:00 a.m., or as
 3 soon thereafter as the matter may be heard by the Honorable Michael W. Fitzgerald,
 4 Courtroom 5A, 350 West 1st Street, Los Angeles, CA, 90012, Saskatchewan
 5 Healthcare Employees' Pension Plan ("SHEPP") will, and hereby does, move this
 6 Court for an order appointing SHEPP as Lead Plaintiff and approving its selection of
 7 Robbins Geller Rudman & Dowd LLP as Lead Counsel pursuant to the Private
 8 Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4(a)(3)(B).

9 Additionally, because the PSLRA permits any "purported class member . . .
 10 including any motion by a class member who is not individually named as a plaintiff
 11 in the complaint" to file a motion for appointment as lead plaintiff, 15 U.S.C. §78u-
 12 4(a)(3)(B)(i), SHEPP cannot ascertain whether any other parties will also seek
 13 appointment as lead plaintiff until after the deadline expires on July 10, 2023.
 14 Accordingly, SHEPP's counsel respectfully requests that compliance with the meet
 15 and confer requirements of Local Civil Rule 7-3 be waived due to the fact that SHEPP
 16 cannot confer with unknown movants. In support of this Motion, SHEPP submits the
 17 accompanying Memorandum of Law, the Declaration of Michael Albert, and a
 18 [Proposed] Order.

19 DATED: July 10, 2023

ROBBINS GELLER RUDMAN
 & DOWD LLP
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23 s/ Michael Albert

24 MICHAEL ALBERT

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Proposed Lead Counsel for Proposed Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on July 10, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Michael Albert

MICHAEL ALBERT

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Mailing Information for a Case 2:23-cv-03602-MWF-AGR Retail Wholesale Department Store Union Local 338 Retirement Fund v. Beyond Meat, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Scott Russell Foglietta**
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- **Avi Josefson**
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- **Jonathan Daniel Uslaner**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)